Statement of Basis of the Federal Operating Permit

Arkema Inc.

Site/Area Name: Beaumont Facility
Physical location: 2810 Gulf States Road
Nearest City: Beaumont
County: Jefferson

Permit Number: O1636
Project Type: Significant Revision

Standard Industrial Classification (SIC) Code: 2869
SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the significant revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a significant permit revision per §§ 122.219-211. This document may include the following information:

A description of the facility/area process description;
A description of the revision project;
A basis for applying permit shields;
A list of the federal regulatory applicability determinations;
A table listing the determination of applicable requirements;
A list of the New Source Review Requirements;
The rationale for periodic monitoring methods selected;
The rationale for compliance assurance methods selected;
A compliance status; and
A list of available unit attribute forms.

Prepared on: February 27, 2014

Operating Permit
Basis of Determination

Description of Revisions
Arkema has revised and updated the compliance schedule for FLARE to reflect new requirements that exclude utilization of alternate opacity limits (AOL) in achieving compliance. Also, Arkema has determined that some fugitive units from GRP-FUG1 are subject to NSPS VVa and a new group, GRP-FUG3, and a high level applicability has been created for these units. Site wide terms and conditions have been updated with a new OP-REQ1.

Permit Area Process Description
Arkema Inc. - Beaumont facility (Arkema) operates a mercaptan production facility and a hydrogen sulfide unit. The emission control devices at the site consist of 1) the plant thermal incinerator, which controls process vents from normal production activities, and 2) the plant flare, which handles emissions from certain plant operations as well as emergencies and upsets. In addition, there are associated process reactors, distillation, fugitive emission sources, product and raw material storage, product loading and shipping, and support facilities. The existing facility was recently modified, adding a second wastewater vaporizer to provide a backup system during maintenance and unscheduled down time of the primary wastewater vaporizer unit.

FOPs at Site
The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

Major Source Pollutants
The table below specifies the pollutants for which the site is a major source:

Major Pollutants	SO2, CO

Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
    - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
    - Additional Monitoring Requirements

    - New Source Review Authorization Requirements
    - Compliance Requirements
    - Protection of Stratosphere Ozone
    - Permit Location
    - Permit Shield (30 TAC § 122.148)
- Attachments
    - Applicable Requirements Summary
        - Unit Summary
        - Applicable Requirements Summary
    - Additional Monitoring Requirements
    - Permit Shield
    - New Source Review Authorization References
    - Compliance Plan
    - Alternative Requirements
- Appendix A
    - Acronym list
- Appendix B
    - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on an OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B
Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flow rate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	Yes
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.

10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feed water) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility
When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
D226	63VVVVVV	63VVVVVV	40 CFR Part 63, Subpart VVVVVV Wastewater Systems = Comply with the requirements of this section and in Table 6 to this subpart for all wastewater streams from a CMPU subject to this subpart.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
REACT ACRO	63VVVVVV	63VVVVVV	40 CFR Part 63, Subpart VVVVVV Wastewater Systems = Comply with the requirements of this section and in Table 6 to this subpart for all wastewater streams from a CMPU subject to this subpart.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
GRP-FWPUMP	30 TAC Chapter 117, Subchapter B	R7ICI	Horsepower Rating = HP is greater than or equal to 300 RACT Date Placed in Service = After June 9, 1993 and before the final compliance date specified in 30 TAC §§ 117.9000, 117.9010 or 117.9020 Functionally Identical Replacement = Unit is not a functionally identical replacement Type of Service = Demonstrated to operate less than 850 hours per year, based on a rolling 12-month average	
GRP-FWPUMP	40 CFR Part 60, Subpart IIII	60IIII-01	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
GRP-FWPUMP	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-01	Brake HP = Stationary RICE with a brake hp greater than or equal to 300 hp and less than or equal to 500 hp. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Installation Date = The emergency use stationary RICE was installed prior to June 12, 2006. Stationary RICE Type = Compression ignition engine	
GRP-GEN1	40 CFR Part 60, Subpart IIII	60IIII-02	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than or equal to 75 KW and less than 130 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Displacement = Displacement is less than 10 liters per cylinder. Service = CI ICE is an emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines. Commencing = CI ICE that is commencing new construction. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture is after 04/01/2006. Model Year = CI ICE was manufactured in model year 2009.	
GRP-GEN1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-02	Brake HP = Stationary RICE with a brake hp greater than or equal to 100 and less than 250 hp. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Installation Date = The emergency use stationary RICE was installed on or after June 12, 2006. Stationary RICE Type = Compression ignition engine	
GRP-GEN2	40 CFR Part 60, Subpart IIII	60IIII-03	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005. Diesel = Diesel fuel is used. Kilowatts = Power rating is greater than 368 KW and less than 600 KW. Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement. Displacement = Displacement is greater than or equal to 20 and less than 25 liters per cylinder. Service = CI ICE is an emergency engine. Standards = The emergency CI ICE meets the standards applicable to non-emergency engines. Commencing = CI ICE that is commencing new construction. Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions. Manufacture Date = Date of manufacture is after 04/01/2006. Model Year = CI ICE was manufactured in model year 2009.	
GRP-GEN2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-03	Brake HP = Stationary RICE with a brake hp greater than 500. Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006. Nonindustrial Emergency Engine = Stationary RICE is not defined as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE. Service Type = Emergency use. Installation Date = The emergency use stationary RICE was installed on or after June 12, 2006. Stationary RICE Type = Compression ignition engine	
D310	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using an internal floating roof (IFR) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
D310	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Fixed roof with an internal floating roof using two seals mounted one above the other to form a continuous closure	
D9867	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
D9868	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons	
GRP-EFR	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Welded tank using an external floating roof True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Primary Seal = Mechanical shoe Product Stored = VOC other than crude oil or condensate Secondary Seal = Secondary seal not determined since 30 TAC §§ 115.117(a)(4) or 115.117(b)(4) exemption is not utilized Storage Capacity = Capacity is greater than 40,000 gallons	
GRP-EFR	40 CFR Part 60, Subpart Kb	60KB	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = Pontoon-type or double-deck-type external floating roof with mechanical shoe primary seal	
GRP-HFR	30 TAC Chapter 115, Storage of VOCs	R5112	Construction Date = On or after May 12, 1973 Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Other control device	
GRP-HFR	40 CFR Part 60, Subpart Kb	60Kb	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = CVS and control device other than a flare (fixed roof)	
GRP-LOAD	30 TAC Chapter 115, Loading and Unloading of VOC	R-5211	30 TAC CHAPTER 115 (REG V) CONTROL DEVICE TYPE = Vapor control system with a flare. 30 TAC CHAPTER 115 (REG V) FACILITY TYPE = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal. ALTERNATE CONTROL REQUIREMENT (ACR) [REG V] = No alternate control requirements are being utilized. VAPOR TIGHT = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected. PRODUCT TRANSFERRED = Volatile organic compounds other than liquefied petroleum gas and gasoline. TRANSFER TYPE = Only loading. TRUE VAPOR PRESSURE [REG V] = True vapor pressure greater than or equal to 0.5 psia. DAILY THROUGHPUT [REG V] = Loading greater than or equal to 20,000 gallons per day. CONTROL OPTIONS = Vapor balance system.	
H202	30 TAC Chapter 117, Subchapter B	R7ICI	DILUENT CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). UNIT TYPE [REG VII] = Process heater 30 TAC CHAPTER 116 (NSR) PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105 is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit CO EMISSION LIMITATION = Title 30 TAC § 117.105(f) MAXIMUM RATED CAPACITY [REG VII] = MRC is less than 40 MMBtu/hr. CO MONITORING SYSTEM = Emissions are monitored using methods other than CEMS or PEMS. NOX EMISSION LIMIT BASIS [REG VII] = Emission limit basis is not a 30 day rolling average or a block one-hour average RACT DATE PLACED IN SERVICE = On or before November 15, 1992 NOX REDUCTION = No NO_x control method COMMON STACK COMBINED = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than $2.2(10^{11})$ Btu/yr. FUEL TYPE #1 [REG VII] = Natural gas NOX MONITORING SYSTEM = Maximum emission rate testing [in accordance with 30 TAC § 117.8000]	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			NOX EMISSION LIMITATION = Title 30 TAC § 117.105	
H2202	30 TAC Chapter 117, Subchapter B	R7ICI	DILUENT CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). UNIT TYPE [REG VII] = Process heater 30 TAC CHAPTER 116 (NSR) PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105 is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit CO EMISSION LIMITATION = Title 30 TAC § 117.105(f) MAXIMUM RATED CAPACITY [REG VII] = MRC is less than 40 MMBtu/hr. CO MONITORING SYSTEM = Emissions are monitored using methods other than CEMS or PEMS. NOX EMISSION LIMIT BASIS [REG VII] = Emission limit basis is not a 30 day rolling average or a block one-hour average RACT DATE PLACED IN SERVICE = On or before November 15, 1992 NOX REDUCTION = No NO_x control method COMMON STACK COMBINED = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than $2.2(10^{11})$ Btu/yr. FUEL TYPE #1 [REG VII] = Natural gas NOX MONITORING SYSTEM = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOX EMISSION LIMITATION = Title 30 TAC § 117.105	
H401	30 TAC Chapter 117, Subchapter B	R7ICI	DILUENT CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). UNIT TYPE [REG VII] = Process heater 30 TAC CHAPTER 116 (NSR) PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105 is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit CO EMISSION LIMITATION = Title 30 TAC § 117.105(f) MAXIMUM RATED CAPACITY [REG VII] = MRC is less than 40 MMBtu/hr. CO MONITORING SYSTEM = Emissions are monitored using methods other than CEMS or PEMS. NOX EMISSION LIMIT BASIS [REG VII] = Emission limit basis is not a 30 day rolling average or a block one-hour average RACT DATE PLACED IN SERVICE = On or before November 15, 1992 NOX REDUCTION = No NO_x control method COMMON STACK COMBINED = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than $2.2(10^{11})$ Btu/yr. FUEL TYPE #1 [REG VII] = Natural gas NOX MONITORING SYSTEM = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOX EMISSION LIMITATION = Title 30 TAC § 117.105	
H501	30 TAC Chapter 117, Subchapter B	R7ICI	DILUENT CEMS = The process heater does not use a carbon dioxide CEMS to monitor diluent. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a),	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			117.340(a) or 117.440(a). UNIT TYPE [REG VII] = Process heater 30 TAC CHAPTER 116 (NSR) PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105 is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit CO EMISSION LIMITATION = Title 30 TAC § 117.105(f) MAXIMUM RATED CAPACITY [REG VII] = MRC is less than 40 MMBtu/hr. CO MONITORING SYSTEM = Emissions are monitored using methods other than CEMS or PEMS. NOX EMISSION LIMIT BASIS [REG VII] = Emission limit basis is not a 30 day rolling average or a block one-hour average RACT DATE PLACED IN SERVICE = On or before November 15, 1992 NOX REDUCTION = No NO_x control method COMMON STACK COMBINED = Unit is not vented through a common stack, or the total rated heat input from combined units is at less than 250 MMBtu/hr or the annual combined heat input is less than $2.2(10^{11})$ Btu/yr. FUEL TYPE #1 [REG VII] = Natural gas NOX MONITORING SYSTEM = Maximum emission rate testing [in accordance with 30 TAC § 117.8000] NOX EMISSION LIMITATION = Title 30 TAC § 117.105	
SULFOX-TO	30 TAC Chapter 117, Subchapter B	R7ICI	NOX EMISSION LIMITATION = Title 30 TAC § 117.110(a)(1). UNIT TYPE = Other industrial, commercial, or institutional boiler. MAXIMUM RATED CAPACITY = MRC is greater than or equal to 40 MMBtu/hr but less than 100 MMBtu/hr. NOX MONITORING SYSTEM = Continuous emissions monitoring system. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). RACT DATE PLACED IN SERVICE = After June 9, 1993, and before the final compliance date specified in 30 TAC § 117.9000. 30 TAC 116 PERMIT LIMIT = Emission limit in 30 TAC § 117.105 is not greater than the NO_x emission limit in any 30 TAC Chapter 116 permit issued after June 9, 1993. CO EMISSION LIMITATION = Title 30 TAC § 117.105(f). FUNCTIONALLY IDENTICAL REPLACEMENT/INST., COMM., INDUSTRIAL SOURCES [REG VII] = Unit is not a functionally identical replacement. CO MONITORING SYSTEM = Continuous emissions monitoring system complying with 30 TAC § 117.8100(a)(1). INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES FUEL TYPE #1 [REG VII] = Natural gas. NH3 EMISSION LIMITATION = Title 30 TAC § 117.105(g). NOX EMISSION LIMIT AVERAGE = Emission limit in pounds/hour on a block one-hour average. NOX REDUCTIONS = No NO_x reduction. ANNUAL HEAT INPUT/INSTITUTIONAL, COMMERCIAL, INDUSTRIAL SOURCES [REG VII] = Annual heat input is greater than $2.8(10^{11})$ Btu/yr, based on rolling 12-month average. COMMON STACK COMBINED = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is $2.2(10^{11})$ Btu/yr or less.	
SULFOX-TO	40 CFR Part 60, Subpart Db	60Db	60.42B(K)(2) LOW SULFUR EXEMPTION = The § 60.42b(k)(2) exemption does not apply.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			ALTERNATE EMISSION LIMITATION (AEL) = The facility combusts byproduct/waste with either natural gas or oil and did not petition the EPA Administrator to establish a NO_x emission limit that applies specifically when the byproduct/waste is combusted. CONSTRUCTION/MODIFICATION DATE = Constructed or reconstructed after July 9, 1997, and on or before February 28, 2005. 40 CFR 60 (NSPS) SUBPART DB HEAT INPUT CAPACITY = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW). 60.42B(K)(4) ALTERNATIVE = The requirements of § 60.42b(k)(1) are used. POST-COMBUSTION CONTROL = The affected facility does not use a post-combustion technology, other than a wet scrubber, to reduce emissions of particulate matter or sulfur dioxide. 60.43B(H)(2) ALTERNATIVE = The facility is not electing to use the alternative requirements of § 60.43b(h)(2) for PM. ELECTRICAL OR MECHANICAL OUTPUT = 10% or less of the annual output is electrical or mechanical. OUTPUT BASED LIMIT = The facility is not electing to comply with the output based limit in § 60.44b(l)(3). STEAM WITH ELECTRICITY = The facility does not generate process steam in combination with electricity. ELECTRICITY ONLY = The facility does not generate electricity only. 60.49DA(N) ALTERNATIVE = The facility is not using the § 60.49Da(n) alternative. 60.49DA(M) ALTERNATIVE = The facility is not using the § 60.49Da(m) alternative.	
SULFOX-TO	40 CFR Part 60, Subpart Dc	60Dc	CONSTRUCTION/MODIFICATION DATE = After June 9, 1989 but on or before February 28, 2005. PM MONITORING TYPE = No particulate monitoring. MAXIMUM DESIGN HEAT INPUT CAPACITY = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW). SO2 INLET MONITORING TYPE = Fuel certification (or maintaining receipts). OTHER SUBPARTS = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB. SO2 OUTLET MONITORING TYPE = Continuous emission monitoring system. HEAT INPUT CAPACITY = Heat input capacity is greater than 75 MMBtu/hr (22 MW). TECHNOLOGY TYPE = None. D-SERIES FUEL TYPE = Natural gas. ACF OPTION - SO2 = Other ACF or no ACF. ACF OPTION - PM = Other ACF or no ACF. 30% COAL DUCT BURNER = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
X426A	30 TAC Chapter 117, Subchapter B	R7ICI	NOX EMISSION LIMITATION = Title 30 TAC § 117.105 (relating to Emission Specifications for Reasonably Available Control Technology). UNIT TYPE = Other industrial, commercial, or institutional boiler. MAXIMUM RATED CAPACITY = MRC is less than 40 MMBtu/hr. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			30 TAC 116 PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105, is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit. CO EMISSION LIMITATION = Title 30 TAC § 117.105(f). NH3 EMISSION LIMITATION = Title 30 TAC § 117.105(g). NOX EMISSION LIMIT AVERAGE = Emission limit in pounds/hour on a block one-hour average. NOX REDUCTIONS = No NO_x reduction. COMMON STACK COMBINED = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is $2.2(10^{11})$ Btu/yr or less.	
X426A	40 CFR Part 60, Subpart Db	60DB	CONSTRUCTION/MODIFICATION DATE = On or after November 25, 1986, and on or before July 9, 1997. 40 CFR 60 (NSPS) SUBPART DB HEAT INPUT CAPACITY = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).	
X426A	40 CFR Part 60, Subpart Dc	60Dc	CONSTRUCTION/MODIFICATION DATE = On or before June 9, 1989. PM MONITORING TYPE = No particulate monitoring. MAXIMUM DESIGN HEAT INPUT CAPACITY = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW). SO2 INLET MONITORING TYPE = Fuel certification (or maintaining receipts). OTHER SUBPARTS = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB. SO2 OUTLET MONITORING TYPE = No SO_2 monitoring. HEAT INPUT CAPACITY = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW). TECHNOLOGY TYPE = None. D-SERIES FUEL TYPE = Natural gas. ACF OPTION - SO2 = Other ACF or no ACF. ACF OPTION - PM = Other ACF or no ACF. 30% COAL DUCT BURNER = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
X426B	30 TAC Chapter 117, Subchapter B	R7ICI	NOX EMISSION LIMITATION = Title 30 TAC § 117.105 (relating to Emission Specifications for Reasonably Available Control Technology). UNIT TYPE = Other industrial, commercial, or institutional boiler. MAXIMUM RATED CAPACITY = MRC is less than 40 MMBtu/hr. FUEL FLOW MONITORING = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a). 30 TAC 116 PERMIT LIMIT = NO_x emission limit in 30 TAC § 117.105, is not greater than the NO_x emission limit in a 30 TAC Chapter 116 permit. CO EMISSION LIMITATION = Title 30 TAC § 117.105(f). NH3 EMISSION LIMITATION = Title 30 TAC § 117.105(g). NOX EMISSION LIMIT AVERAGE = Emission limit in pounds/hour on a block one-hour average.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			NOX REDUCTIONS = No NO_x reduction. COMMON STACK COMBINED = The unit is not vented through a common stack; or the total rated heat input from combined units is less than 250 MMBtu/hr; and the annual combined heat input is 2.2(10^{11}) Btu/yr or less.	
X426B	40 CFR Part 60, Subpart Db	60DB	CONSTRUCTION/MODIFICATION DATE = On or after November 25, 1986, and on or before July 9, 1997. 40 CFR 60 (NSPS) SUBPART DB HEAT INPUT CAPACITY = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).	
X426B	40 CFR Part 60, Subpart Dc	60Dc	CONSTRUCTION/MODIFICATION DATE = On or before June 9, 1989. PM MONITORING TYPE = No particulate monitoring. MAXIMUM DESIGN HEAT INPUT CAPACITY = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW). SO2 INLET MONITORING TYPE = Fuel certification (or maintaining receipts). OTHER SUBPARTS = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB. SO2 OUTLET MONITORING TYPE = No SO_2 monitoring. HEAT INPUT CAPACITY = Heat input capacity is greater than 10 MMBtu/hr (2.9 MW) but less than 30 MMBtu/hr (8.7 MW). TECHNOLOGY TYPE = None. D-SERIES FUEL TYPE = Natural gas. ACF OPTION - SO2 = Other ACF or no ACF. ACF OPTION - PM = Other ACF or no ACF. 30% COAL DUCT BURNER = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than 30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.	
FLARE	30 TAC Chapter 111, Visible Emissions	R-1111	ACID GASES ONLY [REG I] = Flare is not used only as an acid gas flare as defined in 30 TAC § 101.1. EMERGENCY/UPSET CONDITIONS ONLY [REG I] = Flare is used under conditions other than emergency or upset conditions. ALTERNATE OPACITY LIMITATION [REG I] = Not complying with an alternate opacity limit under 30 TAC § 111.113. CONSTRUCTION DATE (NEWEST SOURCE ROUTING TO FLARE) [REG I] = Newest source routing emissions to the flare began construction after January 31, 1972.	
FLARE	40 CFR Part 60, Subpart A	R-1111	SUBJECT TO 40 CFR 60.18 = Flare is not subject to 40 CFR § 60.18.	
FLARE	40 CFR Part 63, Subpart A	R-1111	REQUIRED UNDER 40 CFR 63 = Flare is not required by a Subpart under 40 CFR Part 63.	
GRP-FUG1	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352	COMPRESSOR SEALS/VOC SERVICE [REG V] = YES FLANGES = YES OPEN-ENDED VALVES ANDLINES = YES PRESSURE RELIEF VALVES IN GASEOUS VOC SERVICE [REG V] = YES PROCESS DRAINS/VOC SERVICE [REG V] = NO PUMP SEALS IN VOC SERVICE [REG V] = YES	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			RUPTURE DISKS = RELIEF VALVES EQUIPPED WITH A RUPTURE DISK OR VENTING TO A CONTROL DEVICE ARE IN USE. Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether (MTBE) manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10. VALVES OTHER THAN PRESSURE RELIEF OR OPEN-ENDED/VOC SERVICE [REG V] = YES ACR = NO ACR FOR FLANGES = NO ALTERNATE CONTROL REQUIREMENT (ACR)-- VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--COMPRESSOR SEALS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PRESSURE RELIEF VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PROCESS DRAINS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PUMP SEALS [REG V] = NO INSTRUMENTATION SYSTEMS = FUGITIVE UNIT HAS INSTRUMENTATION SYSTEMS THAT MEET 40 CFR § 63.169 Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components. SAMPLING CONNECTON SYSTEMS = FUGITIVE UNIT HAS SAMPLING CONNECTION SYSTEMS THAT MEET 40 CFR § 63.169 WEIGHT PERCENT VOC IN PROCESS FLUID [REG V] = PROCESS FLUID CONTAINS AT LEAST 10% VOC BY WEIGHT (PETROLEUM REFINERY, SYNTHETIC ORGANIC CHEMICAL, POLYMER RESIN OR MTBE MANUFACTURING PROCESSES) COMPLYING WITH §115.352(1) = YES COMPLYING W/ 30 TAC 115.352(1)--PROCESS DRAINS = YES RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS [REG V] = NO RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS USED IN NATURAL GAS/GASOLINE PROCESSING OPERATIONS TVP LESS THAN OR EQUAL TO 0.002 PSIA = FUGITIVE UNIT DOES NOT HAVE COMPONENTS THAT CONTACT A PROCESS FLUID CONTAINING A PROCESS FLUID CONTAINING VOC HAVING A TRUE VAPOR PRESSURE OF 0.002 PSIA OR LESS TVP LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) GREATER THAN 0.044 PSIA AT 68 DEGREES FAHRENHEIT TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO TVP OF PROCESS FLUID VOC <= 0.044 PSI @ 68° = NO TVP OR PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO REMAINING SEALS COMPLY WITH 115.352(1)--PUMP SEALS [REG V] = YES TVP GREATER THAN 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) GREATER THAN 0.044 PSIA AT 68 DEGREES FAHRENHEIT TVP OF PROCESS FLUID > 0.044 PSIA = YES TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO TVP OF PROCESS FLUID VOC > 0.044 PSIA @ 68° F = YES Complying With § 115.352(1) = YES	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-FUG1	40 CFR Part 60, Subpart VV	60VV-01	CLOSED VENT (OR VAPOR COLLECTION) SYSTEM [NSPS VV] = NO CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NSPS VV] = NO CLOSED VENT SYSTEM WITH ENCLOSED COMBUSTION DEVICE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NSPS VV] = CLOSED VENT SYSTEM WITH FLARE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NSPS VV] = NO CLOSED VENT SYSTEM WITH VAPOR RECOVERY SYSTEM AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. COMPRESSORS (ANY SERVICE) [NSPS VV] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. EQUIPMENT IN VACUUM SERVICE [NSPS VV] = ANY EQUIPMENT IN VACUUM SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS VV] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRESSURE RELIEF DEVICES IN HEAVY LIQUID SERVICE = YES PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 40 CFR 60.489 VALVES HEAVY LIQUID SERVICE [NSPS VV] = VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) EQUIVALENT EMISSION LIMIT = NO EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--CVS/ENCLOSED COMBUSTION DEVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--CVS/FLARE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--OPEN-ENED VALVES/LINES [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--VALVES HEAVY LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). PUMPS IN LIGHT LIQUID SERVICE [NSPS VV] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. 40 CFR 60 (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 5, 1981 EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). 40 CFR 60 SUBPART VV DESIGN CAPACITY = SITE WITH DESIGN CAPACITY GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ FLARE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-10	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			COMPLYING W/ 40 CFR 60.482-3--COMPRESSORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-3 COMPLYING W/ 40 CFR 60.482-6--OPEN-ENDED VALVES OR LINES [NSPS VV] = COMPLYING WITH 40 CFR 60.482-6 COMPLYING W/ 40 CFR 60.482-8--VALVES HEAVY LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-8 COMPLYING WITH § 60.482-8 = YES COMPLYING W/ 40 CFR 60.482-2--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-2 FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS VV] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRESSURE RELIEF DEVICES GAS/VAPOR SERVICE [NSPS VV] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRODUCES HEAVY LIQUID CHEMICALS FROM HEAVY LIQUID FEED/RAW MATERIAL [NSPS VV] = THE FACILITY PRODUCES OTHER THAN HEAVY LIQUID CHEMICALS ONLY FROM HEAVY LIQUID FEED OR RAW MATERIALS SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS VV] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. BEVERAGE ALCOHOL PRODUCTION [NSPS VV] = THE FACILITY DOES NOT PRODUCE BEVERAGE ALCOHOL COMPLY WITH §60.482-4(A)-(B) = YES EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES/CONNECTORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--SAMPLING CONNECTION SYSTEMS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--VALVES GAS/VAPOR, LIGHT LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). PUMPS IN HEAVY LIQUID SERVICE [NSPS VV] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE [NSPS VV] = FACILITY CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE PRESSURE RELIEF DEVICES IN LIGHT LIQUID SERVICE = YES COMPLYING W/ 40 CFR 60.482-5--SAMPLING CONNECTION SYSTEMS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-5 COMPLYING W/ 40 CFR 60.482-7--VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-7 COMPLYING W/ 40 CFR 60.482-8--FLANGES AND OTHER CONNECTORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-8 EQUIVALENT EMISSION LIMIT = NO COMPLYING WITH § 60.482-8 = YES	
GRP-FUG3	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352	COMPRESSOR SEALS/VOC SERVICE [REG V] = YES FLANGES = YES	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			OPEN-ENDED VALVES ANDLINES = YES PRESSURE RELIEF VALVES IN GASEOUS VOC SERVICE [REG V] = YES PROCESS DRAINS/VOC SERVICE [REG V] = NO PUMP SEALS IN VOC SERVICE [REG V] = YES RUPTURE DISKS = RELIEF VALVES EQUIPPED WITH A RUPTURE DISK OR VENTING TO A CONTROL DEVICE ARE IN USE. Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether (MTBE) manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10. VALVES OTHER THAN PRESSURE RELIEF OR OPEN-ENDED/VOC SERVICE [REG V] = YES ACR = NO ACR FOR FLANGES = NO ALTERNATE CONTROL REQUIREMENT (ACR)-- VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--COMPRESSOR SEALS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PRESSURE RELIEF VALVES [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PROCESS DRAINS [REG V] = NO ALTERNATE CONTROL REQUIREMENT (ACR)--PUMP SEALS [REG V] = NO INSTRUMENTATION SYSTEMS = FUGITIVE UNIT HAS INSTRUMENTATION SYSTEMS THAT MEET 40 CFR § 63.169 Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components. SAMPLING CONNECTON SYSTEMS = FUGITIVE UNIT HAS SAMPLING CONNECTION SYSTEMS THAT MEET 40 CFR § 63.169 WEIGHT PERCENT VOC IN PROCESS FLUID [REG V] = PROCESS FLUID CONTAINS AT LEAST 10% VOC BY WEIGHT (PETROLEUM REFINERY, SYNTHETIC ORGANIC CHEMICAL, POLYMER RESIN OR MTBE MANUFACTURING PROCESSES) COMPLYING WITH §115.352(1) = YES COMPLYING W/ 30 TAC 115.352(1)--PROCESS DRAINS = YES RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS [REG V] = NO RECIPROCATING COMPRESSORS OR POSITIVE DISPLACEMENT PUMPS USED IN NATURAL GAS/GASOLINE PROCESSING OPERATIONS TVP LESS THAN OR EQUAL TO 0.002 PSIA = FUGITIVE UNIT DOES NOT HAVE COMPONENTS THAT CONTACT A PROCESS FLUID CONTAINING A PROCESS FLUID CONTAINING VOC HAVING A TRUE VAPOR PRESSURE OF 0.002 PSIA OR LESS TVP LESS THAN OR EQUAL TO 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) GREATER THAN 0.044 PSIA AT 68 DEGREES FAHRENHEIT TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO TVP OF PROCESS FLUID VOC <= 0.044 PSI @ 68° = NO TVP OR PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO REMAINING SEALS COMPLY WITH 115.352(1)--PUMP SEALS [REG V] = YES TVP GREATER THAN 0.044 PSIA AT 68 DEGREES F--PROCESS DRAINS [REG V] = PROCESS FLUID HAS A TRUE VAPOR PRESSURE (TVP) GREATER THAN 0.044 PSIA AT 68 DEGREES FAHRENHEIT	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			TVP OF PROCESS FLUID > 0.044 PSIA = YES TVP OF PROCESS FLUID LESS THAN OR EQUAL TO 0.044 PSIA = NO TVP OF PROCESS FLUID VOC > 0.044 PSIA @ 68° F = YES Complying With § 115.352(1) = YES	
GRP-FUG3	40 CFR Part 60, Subpart VV	60VV-01	CLOSED VENT (OR VAPOR COLLECTION) SYSTEM [NSPS VV] = NO CLOSED-VENT SYSTEM (CVS) WITH ENCLOSED COMBUSTION DEVICE [NSPS VV] = NO CLOSED VENT SYSTEM WITH ENCLOSED COMBUSTION DEVICE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CLOSED-VENT SYSTEM (CVS) WITH FLARE AS CONTROL DEVICE [NSPS VV] = CLOSED VENT SYSTEM WITH FLARE AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CLOSED-VENT SYSTEM (CVS) WITH VAPOR RECOVERY SYSTEM [NSPS VV] = NO CLOSED VENT SYSTEM WITH VAPOR RECOVERY SYSTEM AS CONTROL DEVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. COMPRESSORS (ANY SERVICE) [NSPS VV] = COMPRESSORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. EQUIPMENT IN VACUUM SERVICE [NSPS VV] = ANY EQUIPMENT IN VACUUM SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. OPEN-ENDED VALVES OR LINES (ANY SERVICE) [NSPS VV] = OPEN-ENDED VALVES OR LINES IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRESSURE RELIEF DEVICES IN HEAVY LIQUID SERVICE = YES PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = PRODUCES AS INTERMEDIATE OR FINAL PRODUCT ONE OR MORE CHEMICALS LISTED IN 40 CFR 60.489 VALVES HEAVY LIQUID SERVICE [NSPS VV] = VALVES IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) = FACILITY IS AN AFFECTED FACILITY AS DEFINED IN 40 CFR 60.480(A)(2) EQUIVALENT EMISSION LIMIT = NO EQUIVALENT EMISSION LIMITATION (EEL)--COMPRESSORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--CVS/ENCLOSED COMBUSTION DEVICE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--CVS/FLARE [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--OPEN-ENED VALVES/LINES [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--VALVES HEAVY LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). PUMPS IN LIGHT LIQUID SERVICE [NSPS VV] = PUMPS IN LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. 40 CFR 60 (NSPS) SUBPART VV CONSTRUCTION/MODIFICATION (RECONSTRUCTION) DATE = AFTER JANUARY 5, 1981 EQUIVALENT EMISSION LIMITATION (EEL)--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = NOT USING	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			EQUIVALENT EMISSION LIMITATION (EEL). 40 CFR 60 SUBPART VV DESIGN CAPACITY = SITE WITH DESIGN CAPACITY GREATER THAN OR EQUAL TO 1,000 MEGAGRAMS PER YEAR COMPLYING W/ 40 CFR 60.482-10--CLOSED VENT SYSTEM W/ FLARE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-10 COMPLYING W/ 40 CFR 60.482-3--COMPRESSORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-3 COMPLYING W/ 40 CFR 60.482-6--OPEN-ENDED VALVES OR LINES [NSPS VV] = COMPLYING WITH 40 CFR 60.482-6 COMPLYING W/ 40 CFR 60.482-8--VALVES HEAVY LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-8 COMPLYING WITH § 60.482-8 = YES COMPLYING W/ 40 CFR 60.482-2--PUMPS LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-2 FLANGES AND OTHER CONNECTORS (ANY SERVICE) [NSPS VV] = FLANGES OR CONNECTORS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRESSURE RELIEF DEVICES GAS/VAPOR SERVICE [NSPS VV] = PRESSURE RELIEF DEVICES IN GAS/VAPOR SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. PRODUCES HEAVY LIQUID CHEMICALS FROM HEAVY LIQUID FEED/RAW MATERIAL [NSPS VV] = THE FACILITY PRODUCES OTHER THAN HEAVY LIQUID CHEMICALS ONLY FROM HEAVY LIQUID FEED OR RAW MATERIALS SAMPLING CONNECTION SYSTEMS (ANY SERVICE) [NSPS VV] = SAMPLING CONNECTION SYSTEMS IN ANY SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = VALVES IN GAS/VAPOR OR LIGHT LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. BEVERAGE ALCOHOL PRODUCTION [NSPS VV] = THE FACILITY DOES NOT PRODUCE BEVERAGE ALCOHOL COMPLY WITH §60.482-4(A)-(B) = YES EQUIVALENT EMISSION LIMITATION (EEL)--FLANGES/CONNECTORS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--SAMPLING CONNECTION SYSTEMS [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). EQUIVALENT EMISSION LIMITATION (EEL)--VALVES GAS/VAPOR, LIGHT LIQUID SVC [NSPS VV] = NOT USING EQUIVALENT EMISSION LIMITATION (EEL). PUMPS IN HEAVY LIQUID SERVICE [NSPS VV] = NO PUMPS IN HEAVY LIQUID SERVICE ADDRESSED IN 40 CFR 60 (NSPS) SUBPART VV INCLUDED IN THE FUGITIVE UNIT. CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE [NSPS VV] = FACILITY CONTAINS EQUIPMENT DESIGNED TO OPERATE IN VOC SERVICE PRESSURE RELIEF DEVICES IN LIGHT LIQUID SERVICE = YES COMPLYING W/ 40 CFR 60.482-5--SAMPLING CONNECTION SYSTEMS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-5 COMPLYING W/ 40 CFR 60.482-7--VALVES GAS/VAPOR OR LIGHT LIQUID SERVICE [NSPS VV] = COMPLYING WITH 40 CFR 60.482-7 COMPLYING W/ 40 CFR 60.482-8--FLANGES AND OTHER CONNECTORS [NSPS VV] = COMPLYING WITH 40 CFR 60.482-8	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			EQUIVALENT EMISSION LIMIT = NO COMPLYING WITH § 60.482-8 = YES	
GRP-FUG3	40 CFR Part 60, Subpart VVa	60VVa-ALL	Construction/Modification Date = After November 7, 2006 Equipment Components = Equipment, as defined in 40 CFR § 60.481a, is included as components of the fugitive unit.	
SULFOXCH LR	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R5352	Title 30 TAC § 115.352 Applicable = Site is not a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether (MTBE) manufacturing process nor a natural gas/gasoline processing operation as defined in 30 TAC 115.10.	
SULFOXCH LR	40 CFR Part 60, Subpart VV	60VV-02	PRODUCES CHEMICALS LISTED IN 40 CFR 60.489 = DOES NOT PRODUCE ANY CHEMICAL LISTED IN 40 CFR 60.489 AS INTERMEDIATE OR FINAL PRODUCT	
SULFOX-CT	40 CFR Part 63, Subpart Q	63Q	USED CHROMIUM COMPOUNDS AFTER SEPT. 8 1994 (MACT Q) = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.	
D226	30 TAC Chapter 115, Vent Gas Controls	R-5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10. VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
D226	30 TAC Chapter 115, Vent Gas Controls	R-5121-2	Alternate Control Requirement = Alternate control is not used. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
D226	30 TAC Chapter 115, Vent Gas Controls	R-5121-3	Alternate Control Requirement = Alternate control is not used. Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor. Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
D3023	30 TAC Chapter 115, Vent Gas Controls	R-5121-1	Alternate Control Requirement = Alternate control is not used. Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source. Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2. Control Device Type = Smokeless flare Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			distillation operation, as defined in 30 TAC § 115.10. VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.	
D3023	30 TAC Chapter 115, Vent Gas Controls	R-5121-2	Alternate Control Requirement = Alternate control is not used. Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C). Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
D3023	30 TAC Chapter 115, Vent Gas Controls	R-5121-3	Alternate Control Requirement = Alternate control is not used. Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor. Vent Type = Vent gas stream originates from a synthetic organic chemical manufacturing industry reactor process or distillation operation, as defined in 30 TAC § 115.10.	
PAINT-1	30 TAC Chapter 115, Surface Coating Operations	R5421	ALTERNATE COMPLIANCE METHOD [REG V] = ALTERNATE METHOD FOR DEMONSTRATING AND DOCUMENTING CONTINUOUS COMPLIANCE WITH APPLICABLE CONTROL REQUIREMENTS OR EXEMPTION CRITERIA HAS NOT BEEN APPROVED ALTERNATE REQUIREMENTS [REG V] = ALTERNATE REQUIREMENT TO 30 TAC 115.421(A)(9) OR 115.421(B)(8) HAS NOT BEEN APPROVED BY TCEQ EXECUTIVE DIRECTOR 30 TAC CHAPTER 115 (REG V) FACILITY OPERATIONS = OTHER METAL PARTS AND PRODUCTS COATING MISCELLANEOUS COATING TYPE [REG V] = ANY OTHER COATING TYPE VOC EMISSION RATE [REG V] = ALL SURFACE COATING OPERATIONS ON A PROPERTY, WHEN UNCONTROLLED, EMIT A COMBINED WEIGHT OF LESS THAN 100 LB/24 HOUR PERIOD AND APPROVAL PER 30 TAC § 115.427(A)(3)(B) HAS BEEN RECEIVED	
REACT ACRO	40 CFR Part 60, Subpart III	60III	CONSTRUCTION / MODIFICATION DATE = AFTER OCTOBER 21, 1983 AFFECTED FACILITY = AIR OXIDATION REACTOR NOT DISCHARGING ITS VENT STREAM INTO A RECOVERY SYSTEM TRE INDEX VALUE = NOT CALCULATED OR CLAIMED FOR EXEMPTION IN § 60.610(C) CONTROL DEVICE = CONTROL DEVICE OTHER THAN A BOILER, PROCESS HEATER, INCINERATOR OR FLARE HAS BEEN APPROVED BY THE ADMINISTRATOR	
REACT ACRO	40 CFR Part 60, Subpart RRR	60RRR	CHEMICALS LISTED IN §60.707 = AFFECTED FACILITY IS NOT PART OF A PROCESS UNIT THAT PRODUCES ANY CHEMICALS LISTED IN 40 CFR § 60.707 AS A PRODUCT, CO-PRODUCT, BY PRODUCT, OR INTERMEDIATE	

* - The "unit attributes" or operating conditions that determine what requirements apply
** - Notes changes made to the automated results from the DSS, and a brief explanation why

NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX1016M1	Issuance Date: 10/13/2010
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 865A	Issuance Date: 10/13/2010
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.474	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: GRP-HFR	
Control Device ID No.: SULFOX-TO	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature not less than 1650 F.	
Basis of monitoring: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;

2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and

3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: D226	
Control Device ID No.: FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-1
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Inlet Flow Rate	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: A maximum inlet gas flow rate greater than 334 scf/sec (1.208 MMscf/hr).	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D226	
Control Device ID No.: FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-1
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Net Heating Value	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum net heating value of the gas combusted is less than 200 Btu/scf.	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D226	
Control Device ID No.: INCIN	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-2
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: The minimum combustion temperature is less than 1380 F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D226	
Control Device ID No.: SULFOX-TO	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-3
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature is less than 1650F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D3023	
Control Device ID No.: FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-1
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Inlet Flow Rate	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: A maximum inlet gas flow rate greater than 334 scf/sec (1.208 MMscf/hr).	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D3023	
Control Device ID No.: FLARE	Control Device Type: Flare
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-1
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Net Heating Value	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: Minimum net heating value of the gas combusted is less than 200 Btu/scf.	
Basis of CAM: A common way to monitor a flare is by measuring inlet flow rate and calculating the net heating value of emissions routed to the flare. If the flow rate is too high or if the net heating value is too low, the flare may not maintain a flame or properly combust emissions. Also, measuring the flow rate and net heating value is consistent with the calculation of the net heating value in 40 CFR Part 60, Subpart A. Utilizing the procedures in 40 CFR Part § 60.18(f)(3) to calculate the net heating value of the gaseous fuels is consistent with 40 CFR Part 60, Subpart A.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D3023	
Control Device ID No.: INCIN	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-2
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: The minimum combustion temperature is less than 1380 F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: D3023	
Control Device ID No.: SULFOX-TO	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Vent Gas Controls	SOP Index No.: R-5121-3
Pollutant: VOC	Main Standard: § 115.121(a)(2)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum combustion temperature is less than 1650F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for vapor combustors. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: REACT ACRO	
Control Device ID No.: SULFOX-TO	Control Device Type: Vapor Combustor
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart III	SOP Index No.: 60III
Pollutant: VOC/TOC	Main Standard: § 60.612(a)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: one hour	
Deviation Limit: Minimum temperature is less than 1650F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 12/17/2013.
2. The compliance history review evaluated the period from 01/11/2008 to 01/10/2013.
   Site rating: 5.81 Company rating: 2.91
   (High < 0.10; Satisfactory > 0.10 and < 55; Unsatisfactory > 55)
3. Has the permit changed on the basis of the compliance history or site/company rating? .....No

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes

OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes
OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes